

**IN THE DISTRICT COURT OF THE UNITED STATES  
FOR THE MIDDLE DISTRICT OF ALABAMA  
EASTERN DIVISION**

**UNITED STATES OF AMERICA**

**v.**

**JOHN JENNINGS, II**

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**Case No.: 3:06cr126-WHA**

**MOTION TO EXTEND PLEA DEADLINE**

Comes the Defendant, by counsel, and respectfully moves to extend the plea deadline under F.R.Cr.P. 11(c)(1)(C), from noon on July 25, 2007 to a date on or after July 30, 2007. In support of this Motion, the Defendant would show:

1. Defense counsel and government counsel are engaged in good faith negotiations to resolve this matter.
2. Defense counsel has been unable to complete the negotiations by the plea deadline, due to his participation as lead counsel in the trial of United States v. Gregory Shiver, Case No. 05-cr-256-LSC, which began on July 23, 2007 and is expected to last through July 25. Defense counsel was appointed to Mr. Shiver's case on July 18, 2007 and has been primarily engaged in trial preparation since that date.
3. Government counsel does not oppose this motion.

Respectfully submitted,

s/ Kevin L. Butler  
KEVIN L. BUTLER  
First Assistant Federal Defender  
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Montgomery, Alabama 36104  
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**CERTIFICATE OF SERVICE**

I hereby certify that on July 25, 2007, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

Susan Redmond, Esquire  
Assistant United States Attorney  
One Court Square, Suite 201  
Montgomery, Alabama 36104

Respectfully submitted,

s/ Kevin L. Butler  
KEVIN L. BUTLER  
First Assistant Federal Defender  
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